

Business Continuity and Disaster Recovery Plan

Approved: October 2026

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1 Plan Overview

1.1 Purpose

The purpose of this plan is to outline the arrangements we have in place for dealing with the sudden or unexpected loss of personnel and/or services; setting out the steps we have put in place to deal with this and the responsibilities for dealing with major threats or disruption to business continuity.

1.2 Goals

The Business Continuity Plan aims to achieve the following goals:

- Decrease susceptibility to disaster
- Minimise recovery time
- Make THA aware of the possible effects of disaster
- Decrease network down time
- Decrease the disruption to services

1.3 Regulatory Assurance

The Business Continuity Plan is covered within the following regulatory assurance standards 1.1, 3.3 and 4.3.

2. Formation of Emergency Leadership Team (ELT)

2.1 ELT

We have formed an Emergency Leadership Team (ELT) who will with restoring services to tenants as quickly as possible. The ELT will be made up of the following people:

Staff Member	Contact Details
Director (Lead)	Alison Leabody – [redacted]
Corporate Services and Governance Manager (Depute Lead)	Sara Pattison – [redacted]
Housing Manager	Stephen Boag – [redacted]

2.2

Should the disaster occur during working hours and results in members of the ELT being injured or fatally injured, colleagues within the organisation will be drafted in to cover their roles in the ELT.

2.3

The Director or the CSO in the absence of the Director will update the Chair and Board members as necessary to discuss any assistance they can provide after the disaster.

2.4

The Chair will be updated with developments at least once a week or daily if necessary and meetings will be held in person or via teams if in person meetings are not possible.

2.5 Scottish Housing Regulator

The Director, or Chair in the Director's absence will notify the Scottish Housing Regulator.

2.6 Insurance

The Corporate Services Officer will contact our Insurers, Zurich to inform them of the situation. They will then be responsible for working with the insurance companies to process the claim.

3. Objects of the Business Continuity Plan

The objective of the BCP is that appropriate procedures are in place to ensure an effective response to an event that has the potential to impact on THA service delivery. The BCP will only be implemented in the event of a 'disaster'. THA has defined 'disaster' as:

"A business interruption event that is extraordinary and that caused disruption to, or loss of key service delivery"

Examples of common disasters falling under the above description include:

- Loss of key premises/offices through major damage or restricted access to buildings;
- Major incident affecting housing stock;
- Adverse weather conditions, pandemic or other unforeseen situation preventing staff from attending their workplace;
- Loss of key IT systems;
- Loss of key staff through widespread illness or strike action;
- Loss of life through fire or serious accident in the workplace; and
- Major utility failure or key suppliers/contractors unable to provide critical services to THA.

Major threats to business continuity can be split into the following categories:

4. Loss of Key Personnel

4.1 Loss of key personnel – depending on whether or not the post is going to be filled, the following steps will be taken.

4.2 Notice given – normal recruitment process will take place provided that the standard notice period has been given. The aim will be for the post to be filled as close to the end of the notice period as possible; if this is not possible and will result in added pressure on the existing staff team, consideration will be given to obtaining temporary cover.

4.3 Unplanned/sudden departure of a staff member with no notice period given – The Director (or Chair in the Director's absence) will liaise with the Management Committee to commence the recruitment process as soon as practically possible. If there is going to be undue pressure on the remaining staff team then a temporary replacement may be sought.

4.4 Retiral – Staff approaching the age of 60 will be asked about their retirement plans during the appraisal system the previous year to try to plan ahead for replacements. However, it is accepted that people's plans can change and this may not always be possible.

4.5 Unplanned departure of multiple staff members (for example a lottery syndicate win) – The Director (or Chair/Office Bearers in the absence of the Director) will take immediate steps to bring in adequate numbers of staff from either agencies, neighbouring RSLs. EVH etc. to provide a minimum level of service to keep the association operating to an acceptable standard. The recruitment process for permanent staff will take place as soon as is practically possible.

5. Loss of Buildings due to fire/flood/major incident etc.

5.1 In the event of a disaster within office hours, the first member of staff to become aware of the disaster should contact the appropriate section of the emergency services depending on the type of type of the incident.

5.2 In the event of a disaster outwith office hours, Pointer Alarms monitor Trafalgar's security and fire systems. They hold the contact details for keyholders and will contact them should a situation occur outwith office hours.

5.3 All staff are provided with a note of each other's contact numbers. A copy is also provided in **Appendix 1**.

In the event of an emergency, the Director will contact all staff and arrange for them to meet at the office or if this is not possible the nearest possible location such as the Golden Jubilee Hotel.

5.4 The Director and/or the CSO will liaise with THA's Health and Safety Advisors, Wilson Adrain to provide support and advice, depending on the nature of the incident/disaster.

5.5 In the event of the Director being unavailable or unable to contact the staff team then the Corporate Services Officer will liaise with the rest of the staff team.

5.6 Staff within office hours

In the event of a disaster within office hours staff should follow the evacuation procedures within THA's Health & Safety Policy. After meeting at the designated point staff will move to the Golden Jubilee Hotel to put the Business Continuity Plan into place.

5.7. Contractors

The maintenance staff and administration staff will contact all contractors to inform them about the situation.

6.0 IT Procedures/Steps to take in the Event of a Cyber Disaster

6.1 A cyber disaster can be described as a cyber event resulting in full or partial loss of systems or data for a number of users.

6.2 As soon as any staff member becomes aware of an ICT issue, they should contact Focus Group our ICT providers on 0330 024 2005 or raise a ticket via the portal advising that the situation should be classed as business critical. This will ensure that the issue is prioritised and escalated by Helpdesk.

6.3 The BCP is designed to ensure critical services remain available during any disruption. Core systems and applications are hosted within Microsoft Azure, providing resilient cloud-based infrastructure, built-in redundancy and secure data protection. In the event of a failure affecting on-premises equipment, connectivity or a primary IT service, failover procedures will be initiated to restore services using available cloud resources and backup systems. Employees can continue working remotely using secure access to Microsoft 365, Azure-hosted applications and company data, enabling business operations to continue with minimal interruption. Following any incident, the IT team will assess the impact, implement recovery actions, communicate updates to stakeholders and review lessons learned to strengthen future resilience. This approach ensures Trafalgar Housing Association can maintain service delivery, protect critical information and respond effectively to unforeseen disruptions.

7.0 Closure due to pandemic, extreme weather or any other unforeseen event.

7.1 If required the Director will arrange for tenants to be advised of the office closure and how we will maintain and deliver essential services through a variety of communication methods i.e. our website, letters, and text messages.

7.2 All staff are equipped to work from home and the office phone can be transferred to a designated mobile number.

8.0 Failure of a Contractor to Provide a Service

In the event that a contractor ceases to trade or can no longer provide a service to the Association for whatever reason, the following steps will be taken:

- THA operates a framework of contractors and therefore holds a robust list of contractors to cover various types of trades where the work can be distributed until another contractor can be sourced if necessary
- Gas related works such as day to day heating repairs and gas servicing are almost exclusively carried out by a single contractor via a successfully tendered contract. However should that contractor cease trading, we have access, via our framework and also via the previous tendering process to other suitably qualified contractors so that tenant safety will not be compromised.

9.0 Disaster Affecting Tenants

A number of scenarios could affect a large number of tenants. Such incidents could include:

- Large scale fire
- Flooding
- Widespread storm damage
- Prolonged loss of electricity or other supplies
- Rail/road accident near properties involving fatalities

In the event of such a disaster, the following procedure should be followed:

The ELT will decide whether further escalation is necessary i.e. emergency services, local authority and other necessary parties such as utilities providers gas/electricity/water should be contacted.

Seek advice from our Health and Safety Consultants where appropriate and if required.

If any properties cannot be occupied the staff team will determine the likely duration that residents would not be able to enter their homes.

For alternative accommodation THA would first consider utilising any void properties and secondly contact the following to arrange alternative emergency accommodation:

- WDC Homeless Team

- BB/Hotel accommodation (for short term accommodation)
- Our partner RSLs to establish whether they would be able to assist with temporary accommodation

10.0 Incident Reporting and Media

A disaster or business continuity incident often creates significant interest from local and national media. Therefore, it is essential that only authorised staff can act as the nomination spokesperson for THA. In most cases the Director will be the point of contact with the media and will inform the Chair of the disaster/business continuity incident. In the absence of the Director, the Chairperson will have delegated authority to deal with media enquiries and authority to contact the Management Committee.

The Director will contact the SHR in relation to reporting the incident if it falls within the SHRs definition of a notifiable event.

Details of the disaster/business continuity event will also be reported to the MC at the next appropriate Meeting.

11.0 Bank

The Corporate Services Officer will contact the banks that the Association deals with to inform them of the situation.

12.0 Temporary Office Accommodation

12.1 Remote working

The ELT will decide, depending on the severity and nature of the disaster with or not it is necessary to source alternative office accommodation. All staff are equipped with to work from home if necessary

Email system is Office 365 and therefore access is available from any internet connection.

The telephone system can be transferred to an alternative number.

12.2 Servers

Latest cloud backup of virtual servers will be restored to temporary physical host server.

Backups are run every night. Test restore of backups are carried out once per month.

12.3 Recovering Files

The Director will liaise regularly with the fire service regarding access to the office in order to uplift essential documents/items.

The ELT will begin to identify which records and files are lost, saveable and those which are not. In doing so they will liaise with our insurers and our Data Protection Officer at RGDP. Most of our records are stored with Restore off-site or electronically and therefore it is anticipated that any such loss should be minimal.

Where we are unable to recover files we will try to establish whether or not we can obtain copies and if it is not possible to do so, information of what has been lost will be recorded.

12.4 Additional Staff

In order to assist with additional work resulting from the disaster, it may be necessary to employ staff on a temporary basis. Any such appointments can be authorised by the Director.

12.5 Post Office

If we have had to move to temporary accommodation, the Corporate Services Officer will contact the local post office to arrange for mail redirection and arrange collection of the mail until the redirection comes into effect.

13.0 Service Delivery

13.2 Maintaining communications with tenants

It is important that communications are maintained. Trafalgar HA will communicate with our tenants through a variety of different methods; letter, newsletter, email, telephone, text messaging, the website and social media.

13.3 Paying staff

The bank transfer is made on the 26th of each month. All salary information is sent to our financial consultant by the Corporate Services Officer at least 3 days before to allow salaries to be processed/approved.

There should be no disruption to this arrangement.

13.4 Rent collection

Rent collection will not be affected by a disaster in THA's office since rents are collected off site.

Allpay, bank and housing benefit statements can all be downloaded and rent payments posted as normal and there should therefore be no disruption to rent postings or managing rent arrears etc.

13.5 Banking

All of THA's banking is done online and there should be no disruption to the normal banking functionality.

13.6 Lettings and Voids

All voids will be logged on SDM as normal and allocated in the normal way.

Housing management staff will arrange to meet new tenants either at the prospective tenant's home, at the property being allocated or at office space provided by one of our neighbour RSLs to sign the new tenancy agreement and associated paperwork.

13.7 Repairs

All repairs are logged on SDM the property management IT system which can be accessed remotely and they will be carried out in the appropriate timescales as normal.

13.1 Maintaining staff morale – communication with staff

In the event of a disaster, staff meetings will be held daily to co-ordinate where staff will be and what duties need carried out. This will be by any means possible, including virtual meetings if necessary.

These meetings will also be used to provide staff with any additional support required to deal with the situation.

14.0 Testing of the Business Continuity Plan

THA will develop a programme of testing and exercising of the BCP. Any lessons learned from the testing of the BCP will be incorporated into the rolling annual review process as part of continuous improvement.

15.0 Equality, Diversity & Inclusion

Trafalgar HA is committed to Equality, Diversity and Inclusion. We strive to be fair in our dealings with all people, communities and organisations, considering the diverse nature of their culture and background and actively promoting inclusion. This policy is in line with Trafalgar's Equality and Human Right's Policy and has been subject to an Equality Impact Assessment.

16.0 Review and Monitoring

This policy will be reviewed every 3 years or earlier if there are any significant changes to our systems or processes.

Business Continuity Plan – Appendix 1

STAFF CONTACT NUMBERS

NAME	MOBILE NUMBER
Alison Leabody	[redacted]
Stephen Boag	
Sara Pattison	
Joanne Walsh	
Samantha Dennis	
Gordon Dickson	
Sharon Frew	

Name of the policy to be assessed	Business Continuity Plan (BCP)	Is this a new policy or a revision?	New
Person(s) responsible for the assessment	Director		
1. Briefly describe the **aims, objectives and purpose** of the policy / proposal/plan	The purpose of BCP is to outline the arrangements we have in place for dealing with the sudden or unexpected loss of personnel and/or services; setting out the steps we have put in place to deal with this and the responsibilities for dealing with major threats or disruption to business continuity.		
2. Who is intended to benefit from the policy / proposal/plan? *(e.g. applicants, tenants, staff, contractors)*	Tenants, residents, owners, staff, contractors and the general public.		
3. What **outcomes** are **wanted** from this policy / proposal/plan? *(e.g. the benefits to customers)*	By putting these plans in place we aim to decrease susceptibility to disaster; minimise recovery time; make THA aware of the possible effects of disaster; decrease network down time; decrease the disruption to services		

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

Age	Disability	Marriage & Civil Partnership	Pregnancy/Maternity
Race	Religion or Belief	Gender	Gender Reassignment
Sexual Orientation			

5. If the policy/proposal is not relevant to any of the protected equality groups listed in part 4, state why and end the process here The policy is applied equally to all parties and therefore has no positive or negative impact upon any of the above	
6. Describe the **likely impact(s)** the policy / proposal could have on the groups identified in part 4	
7. What **actions** are **required** to address the impacts arising from this assessment? *(This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).*	

Equality Impact Assessment Carried Out by: Alison Dearbody Signed Job Title: Director

Date Equality Impact Assessment was carried out: 27/8/2026